

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO

STATE OF OHIO *ex rel.* Dave Yost,
Ohio Attorney General,

Plaintiff,

v.

FIRSTENERGY CORP., et al.,

Defendants,

Case No. 20 CV 006281

JUDGE CHRIS BROWN

CITY OF CINCINNATI and
CITY OF COLUMBUS,

Plaintiffs,

v.

FIRSTENERGY CORP., et al.,

Defendants,

Case No. 20 CV 007005¹

JUDGE CHRIS BROWN

STATE OF OHIO *ex rel.*
Dave Yost, Ohio Attorney General,

Plaintiff,

v.

ENERGY HARBOR CORP., et al.,

Defendants.

Case No. 20 CV 007386²

JUDGE CHRIS BROWN

¹ *City of Cincinnati, et al. v. FirstEnergy Corp., et al.*, consolidated by order filed Dec. 14, 2020.

² *State of Ohio ex rel. Dave Yost v. Energy Harbor Corp., et al.*, consolidated by order filed Dec. 14, 2020.


**AFFIDAVIT SUPPLEMENTING PLAINTIFF'S MOTION FOR PREJUDGMENT
ATTACHMENT AND ORDER ENTERED AUGUST 12, 2021**

I am Charles M. Miller, Attorney for Plaintiff in the within action; Upon information and belief,

1. The affidavit filed with Plaintiff's motion for prejudgment attachment August 12, 2021 is incorporated herein;
2. After additional reasonable investigation and discovery, Affiant believes Randazzo and Sustainability Funding Alliance of Ohio, Inc. (SFAO) will transfer, dispose of, assign, or conceal additional assets, not exempt from attachment or execution, for the purpose of transferring and/or hiding assets from creditors including the State of Ohio.
3. Those assets include: \$500,000 held in trust by Cranberry CT Law LLC, Statutory Agent Roger P. Sugarman, 6025 Cranberry Court, Columbus, OH 43213; at The Huntington National Bank, 41 S. High Street, 1st Floor, Columbus, OH 43215, account ending in [REDACTED].
4. Additional assets include: \$2,500,000 held in trust by Loeb and Loeb, LLP; 10100 Santa Monica Boulevard, Suite 2200, Los Angeles, CA 90067; at City National Bank, Legal Processing, 350 South Grand Ave., Los Angeles, CA 90071, account ending in [REDACTED].
5. The above \$3,000,000 was transferred from the Charles Schwab and Co. account referenced in the original affidavit, to the above-referenced transferees, on or about August 2, 2021. Affiant believes all or most of the \$3,000,000 is being held in trust accounts for the benefit of Randazzo, and has not been paid to the law firms for work already performed. Affiant believes the money was transferred for the purpose of shielding it from attachment and/or garnishment.
6. Loeb and Loeb, LLP transacted business in Ohio with Randazzo in connection with the above transfer, and thereby subjected itself to the jurisdiction of this court.
7. Affiant has reason to believe Randazzo may transfer, dispose of, assign, or conceal additional assets, not exempt from attachment or execution, for the purpose of transferring and/or hiding assets from creditors including the State of Ohio. Those assets include 1725 Gerrard Ave., Columbus, OH 43212, and 645 South Grant Avenue, Unit 18, Columbus, OH 43206. The legal descriptions for these properties are filed as Exhibit F to the original affidavit, filed in the within case August 13, 2021.
8. Further, SFAO owns, and may transfer, dispose of, assign, or conceal additional assets, not exempt from attachment or execution, for the purpose of transferring and/or hiding assets from creditors including the State of Ohio. The legal descriptions for those assets include:

- a. Situated in the City of Columbus, County of Franklin, and State of Ohio: And Known as being 492-4 E MOUND ST VETTERLEIN LOT 5-6
Permanent Parcel No. 010-012073-00
 - b. Situated in the City of Columbus, County of Franklin, and State of Ohio: And Known as being 493-491 E NOBLE ST VETTERLEIN LOT 5-6
Permanent Parcel No. 010-100761-00
 - c. Situated in the City of Columbus, County of Franklin, and State of Ohio: And Known as being 327 S. Washington Avenue, VETERLEIN SUB. 49.5' NE LOTS 7 & 8.
Permanent Parcel No. 010-006483-00
9. Additionally, Randazzo owns vehicles, including a 1994 Mazda MX-5 Miata, VIN# JMINA3534R [REDACTED]; and a pink 2002 Porsche 911 Carrera2/4 convertible, VIN#WP0CA29932S [REDACTED]; and a 2015 Porsche Macan S, VIN# WP1AB2A51FLB [REDACTED]. These vehicles are kept at one of several locations, including 645 S. Grant St., Columbus, OH 43206.
10. The value of the Porsche 911 is approximately \$25,000.
11. The value of the Mazda is around \$7,000.
12. The Porsche Macan S is worth approximately \$33,000. The title has a lien from Bank of America, which will be notified of any sheriff's sale of the vehicle.

FURTHER AFFLIANT SAYETH NAUGHT.


Charles M. Miller

Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was submitted to the Clerk's electronic filing system for distribution to all parties registered as users with that system and served by electronic mail or US Mail, postage prepaid, this 17th day of August, 2021, and additional new parties:

Roger P. Sugarman (0012007)
Attorney At Law
6025 Cranberry Ct.
Columbus, OH 43213
(614) 578-6456
rogerpsugarman@gmail.com

Attorney for Samuel C. Randazzo And Sustainability Funding Alliance of Ohio, Inc.

CHARLES E. JONES
4443 Bridle Trail
Akron, Ohio 44333

MICHAEL J. DOWLING
7367 Roman Avenue NW
Massillon, Ohio 44646

IEU-OHIO ADMINISTRATION COMPANY, LLC.
C/O Statutory Agent, James H. Gordon
7677 Patterson Road
Hilliard, Ohio 43026

/s/Charles M. Miller
CHARLES M. MILLER (0073844)